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Attorneys for Defendants

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

PERDANA CAPITAL (LABUAN) INC., a Malaysian Corporation,)	CASE NO. CV 09-01479 RS
)	
Plaintiff,)	Assigned to Hon. Richard Seeborg
)	
v.)	STIPULATION AND [PROPOSED]
)	ORDER WITH RESPECT TO
MOHAMMAD AKRAM CHOWDRY, an)	PLAINTIFF PERDANA CAPITAL
Individual; HI-TECH VENTURE PARTNERS,)	(LABAUN), INC.'S <i>EX PARTE</i>
LLC, a Delaware Limited Liability Company;)	APPLICATION FOR AN ORDER
HI-TECH ASSOCIATES, LLC, a California)	CONTINUING HEARING ON
Limited Liability Company; and DOES 1-50,)	DEFENDANTS' MOTIONS FOR
)	SUMMARY JUDGMENT AS
Defendants.)	MODIFIED BY THE COURT

1 **WHEREAS**, the Case Management Scheduling Order in this case, dated March 7, 2012,
 2 (Docket No. 134) (“Scheduling Order”) ordered that “[a]ll pretrial motions must be filed and
 3 served pursuant to Civil Local Rule 7 [and] ... shall be heard no later than January 26, 2012”;

4 **WHEREAS**, on December 21, 2011, defendants Mohammad Akram Chowdry, Hi-Tech
 5 Venture Partners, LLC and Hi-Tech Associates, LLC (collectively “defendants”) filed Motions
 6 for Summary Judgment (Docket Nos. 146-155) (“Motions for Summary Judgment”) with a
 7 hearing date of January 26, 2012;

8 **WHEREAS**, on December 23, 2011, plaintiff Perdana Capital (Labau), Inc. (“plaintiff”) ⁹
 9 filed an *Ex Parte* Application for an Order Continuing Hearing on Defendants’ Motions for
 10 Summary Judgment (Docket No. 156) (“Application”);

11 **WHEREAS**, on December 26, 2011, defendants filed a Notice of Intent to File a
 12 Response to the Application (Docket No. 157);

13 **WHEREAS**, on December 27, 2011, defendants filed a Response to the Application
 14 (Docket No. 158);

15 **WHEREAS**, the parties have met and conferred with respect to the issues raised in the
 16 Application;

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND**
 18 **RESPECTFULLY REQUESTED** by the undersigned parties, as follows:

19 1. That the hearing on defendants’ Motions for Summary Judgment be continued
 20 from January 26, 2012 to **Thursday, February 2, 2012 at 1:30 p.m.** in Courtroom 3 on the 17th
 21 Floor of the United States Courthouse, 450 Golden Gate Avenue, San Francisco;

22 2. That plaintiff’s oppositions to defendants’ Motions for Summary Judgment shall
 23 be filed and served no later than January 11, 2012;

24 3. That defendants’ replies to plaintiff’s oppositions to defendants’ Motions for
 25 Summary Judgment shall be filed and served no later than January 19, 2012;

4. That this Stipulation and [Proposed] Order shall have no effect on any deadlines with respect to any other pretrial motion, and, in particular, that the deadlines and requirements with respect to pretrial motions established by the Scheduling Order shall otherwise remain in full force and effect.

IT IS SO STIPULATED.

DATED: December 28, 2011

LAW OFFICES OF MICHAEL Q. EAGAN

By: /s
Thomas H. Manulkin

Attorneys for Defendants Mohammad Akram Chowdry,
Hi-Tech Venture Partners, LLC and Hi-Tech Associates,
LLC

DATED: December 28, 2011

KAUFMAN DOLOWICH VOLUCK & GONZO LLP

By: /s
Joseph Kouri

Attorneys for Plaintiff Perdana Capital (Labuan), Inc.

I, Thomas H. Manulkin, of the Law Offices of Michael Q. Eagan, whose ID and password are being used to file this Stipulation, hereby attest, in accordance with General Order 45, X(B), that Joseph Kouri of Kaufman Dolowich Voluck & Gonzo, LLP, has concurred in this filing.

DATED: December 28, 2011

LAW OFFICES OF MICHAEL Q. EAGAN

By: /s
Thomas H. Manulkin, Esq.

Attorneys for Defendants Mohammad Akram Chowdry,
Hi-Tech Venture Partners, LLC and Hi-Tech Associates,
LLC

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2 DATED: 12/28/11

3 

4 Hon. Richard Seeborg
United States District Judge